Illinois Environmental Protection Agency Division of Land Pollution Control

INSPECTION REPORT

	Politicon Control	WO ZONOWNE ON
USEPA#: IL Dece		EPA#: 1631215003
Facility Name: Sauces his	TE WATER TRONTAGENT PLANT	(P CHIEM) Phone #: 1/8/271-4085
Street Address: - 10 M	OBILE AVENUE	County: St. CLAIR
City: Saucet		State: _T
Region: 6	Inspection Date: 6 / 15 /	<u>1</u> From: <u>/0:30</u> To: <u>//:30</u>
Weather: Sway 92"		
	TYPE OF FACILI	77
Notified As:		egulated As: N/A
LDF? HPV?	90-Day F/U Required?:	
<u></u>	TYPE OF INSPEC	TION
RCPA: Sampling:		Closed: Other:
Record Review:	Follow-Up to Inspection of	
	NON-REGULATED	SIATUS
SQG: · CI	aimed Nonhandler:	Other (Specify in Narrative):
	PART A	
Notification Date:	/ , from (initia	f) or (subsequent) Notification.
Initial Part A Date:/_	_/	Amended: / /
Part A Withdrawal requested:	//	Approved by (US)(IL) EPA://
	PART B PERMIT AP	PLICATION
Part B Permit called by (US)(IL)	EPA on://	Permit Due://
Part B Permit Submitted:		Draft Permit Issued://
	ENFORCEMENT	r
Has firm been referred to:	USEPA?	IAG? County SA?
Date(s) of initial referral:		
USEPA CACO:'	/ CAFO:/_	/ ALJ Decision://
Referral to DOJ by USEPA:	//Federal	Court Order Issued://
PCB Order Issued:	_//	State Court Order Issued://
	TSD FACILITY ACTIVIT	Y SUMMARY
Account by graft	We fire the constraint of the	Exempt our On Arrust Rep
Process Code		35 IAC, 500.
		Commission 1
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		DESCRIPTION OF THE PROPERTY OF
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		2 JUL 1990
		2 JUL 1990 IEPA/DLPC

SUMMARY OF APPARENT VIOLATIONS

OWNER		OF	PERATOR	
Name Saudet NWTP. (2	CHEM PLANT	Name Jour	cted	
Address _1/3 Meene S	IREET.	Address Same	15 64	NEC
City Aver-		City	-6.4 fo a.e Fo a 6 16	· • • • • • • • • • • • • • • • • • • •
State IL	Zip 67201	State	+ +	Zip
Phone # 611/271-4055		Phone #	· • • • • • • • • • • • • •	
PERSON(S) INTER		TITLE		PHONE #
ROBERT ROPAL		PLANT NOR : MERICAL	Bossen	1614/337-1710
LENN LOTTY		Prone MbR - Succe V	NWTP.	61x:271-4085
3				
- INSPECTION PARTI	CIPANT(S)	AGENCY/TIT	LE	PHONE #
Stove NeguTT		EPS. 1 TEDA		618-346-5120
JEFF SOLLIEBACHER		EFS.1 ITTA		//
7		* * * * * * * * * * * * * * * * * * *		
PREPARED	BY	AGENCY/TI1	LE	PHONE #
STEVE NOBUTT		ED1-1 1CDU		618-346-5720
Asea Cass Section	Aries (Section Section	Neg /	RECEIVED
the state of the s		14.12 A		

DATE:

July 9, 1990

TO:

Division File

FROM:

Steve Noblitt, DLPC-Collinsville

SUBJECT: Sauget / Sauget Waste Water Treatment Plant

St. Clair County - 1631215003

On June 14, 1990 this office received a complaint stating that Sauget Waste Water Treatment Plant (P-Chem Plant) was currently excavating contaminated sludge from two of their storm water surge lagoons and that the activity had been occurring over the past several days. The complainants concern was that the material was potentially hazardous, possibly contaminated with PCB's. The complainant further stated that the material was being transported to BFI landfill in Belleville by Barbier Trucking, a licensed special waste hauler.

Jeff Schoenbacker and I visited Sauget WWTP late in the afternoon of June 14 to determine the validity of the complaint. We observed at a distance that excavation of at least one of the storm water surge lagoons had been conducted. Jeff Schoenbacher and I then went to BFI to review their past weeks records of incoming waste. Because no record of a permit for such disposal by Sauget WWTP at BFI could be found in our office, it was our intention to uncover a permit violation by Sauget and BFI in connection with the lagoon sludge disposal. Upon reviewing BFI manifests it could not be adequately determined that such waste was received at the landfill during the past week.

According to Nick Mahlandt, IEPA-DWPC, the lagoons in question receive untreated waste water during periods of storm conditions. Water entering the lagoons does not pass through clarifiers. It's only treatment is by addition of lime. Water remains in the lagoons until capacity of the P-Chem plant warrants treatment. Our offices concern at that point was that since the water had not been treated, contaminants in the water would settle out in the form of potentially hazardous sludge.

On June 15, 1990 Jeff Schoenbacher and I arrived at the P-Chem Plant and observed excavation activities taking place. We determined that loads were not being disposed of at BFI but at Laidlaw in Belleville. Upon nur arrival at the landfill we instructed the landfill operator to deny the trucks access to the

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site until we could determine if the necessary permit existed. We phoned our office and learned that no documentation existed on the specific sludge. Laidlaw, however produced a letter from Ed Bakowski, IEPA-Permits Section, which stated that the sludge in question could be landfilled under Sauget's current permit for filter cake. That letter referred to a previous conversation between Mr. Bakowski and Robert Roddy of American Bottoms WWTF. The letter explained that since the storm water lagoon sludge and the filter cake are "characteristically identical", based on American Bottoms own analysis, the material is acceptable under the already existing permit and no additional permits need be applied for by Sauget. After review of the paper work we took samples from each of three trucks at the landfill. We also pulled samples at the working area of the landfill where the loads were dumped. Those particular samples were split with Sauget. Samples are to be analyzed for E.P. Tox metals, organics and PCB's.

On June 18 a meeting was held with Mr. Roddy and Jon Lotzy, P-Chem Plant, Manager, to discuss the excavation. Mr. Roddy explained that, as discussed with Ed Bakowski, the storm water sludge and filter cake were characteristically the same. Mr. Roddy produced a great deal of sample results from over the past year to show that the material was not hazardous. Samples from the landfill that were split with Sauget were a'so run and showed no levels that caused concern. We arrived at the agreement that over the remaining course of the project, approximately five more weeks, the facility will submit to us on a weekly basis, sample results of the material excavated and landfilled.

066274

D.L.P.C. COMPLAINT INVESTIGATION FORM C-90-64-5

Date Received 6/14/40 By 6,7,00 Complainant ANONYMOUS Address Telephone Directions To Source Source (Vegy ATT)	Respondent Source WATP Address = 10 Magnet int Telephone 618-271-4535 16 Sindi Gram Ponos palo Dum OGC Has Strank Cook & OIL PAPET
Address Telephone Directions To Source Source Omplaint Details France (Valation) AT BE IN BRUNNICE, SUR FOR PEB CONTAMINATION	Respondent Source WATP Address = 10 Magnet int Telephone 618-271-4535 16 Sindi Gram Ponos palo Dum OGC Has Strank Cook & OIL PAPET
Address Telephone Directions To Source Source Omplaint Details France (Valation) AT BE IN BRUNNICE, SUR FOR PEB CONTAMINATION	Respondent Source WATP Address = 10 Magnet int Telephone 618-271-4535 16 Sindi Gram Ponos palo Dum OGC Has Strank Cook & OIL PAPET
Address Telephone Directions To Source SavarT Complaint Details Facure (Valaria) AT BF: IN BRUNNICE, Surface FOR PCB CENTAM, NAMED .	Address = 10 Mague pro- Telephone 618-271-4535 16 Super Gram Panos pala Dum OGE Has Stranc ODOR & OIL PIPET
Telephone Directions To Source SavatT Complaint Details Factory (VCAVATION AT BEI IN BRUCUREC, SCOTE FEAR PLB CONTAMINATION	Telephone 618-271-4535
Directions To Source Savart Complaint Details Francis (Valaria) AT BE IN BRICHICE, SUR FEAR PLB CONTAMINATION	16 Swall Grow Power pale Dum OGE HAS STRONG COOR & OIL PAPER
Complaint Details FACTOR (V CONSTITUTE) AT BF1 IN BOLEVILLE, SUIT FOR PCB CONTAMINATION	OGÉ HAS STRING DOOR & OIL PIPET
AT BEI IN BRUNNER. SUIT	OGÉ HAS STRING DOOR & OIL PIPET
FEAR PLB G-NTAM. NAMEN	
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INVESTIGATIO	NW FINDINGS
Date 1/16/90 Time 10:30	•
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Interviewed	Weather 85°-90° Photos 13
Violations Observed <u>Sec Rema</u>	RKS DAGE.
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Description Personne	
Respondent's Remarks	
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FOLLOW-UP	ACTION
Refer To	No.
ile Opened Yes No	FECEIVE



